

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00900054-2013**
Application Received: **January 28, 2013**
Plant Identification Number: **03-54-00900054**
Permittee: **Precoat Metals Corporation**
Mailing Address: **4502 Freedom Way, Weirton, WV 26062**
Revised: NA

Physical Location:	Weirton, Brooke County, West Virginia
UTM Coordinates:	534.83 km Easting • 4474.18 km Northing • Zone 17
Directions:	From Wheeling, take Route West Virginia 2 N. Travel 22 miles and then merge on to US 22 East. Take exit 2 (Main Street) towards downtown Weirton. Turn left on Freedom Way. Plant is on left.

Facility Description

Precoat Metals Corporation's Weirton facility is a metal coil coating facility with a maximum capacity of 158,231.5 pounds of metal coil coated per hour. The metal coil coating facility has a SIC code of 3479 and NAICS code of 332812. Metal coils delivered to the facility are run through the preclean section to remove oil from the surface of the strip. The strip then passes through the wet section for cleaning, rinsing, and chemical treatment. After the wet section, the strip is run through an infrared drying oven. Then, the metal strip passes through the coater room where primer is applied, and on through the primer oven to the quench/cooling area. From the quench/cooling area, the metal strip returns to the coater room where a top coat is applied. From the finish coater, the metal strip passes through the finish oven to the quench/cooling area. The prime and finish ovens exhaust to the afterburner (thermal oxidizer) and the waste heat is drawn through the waste heat boiler to generate steam for heating the wet section tanks. When steam is not required, the exhaust is directed through the bypass stack. Finished coils are packaged and shipped to other locations for further processing. An onsite wastewater treatment system is operated to treat process wastewater from coil cleaning, rinsing, chemical treatment, and quenching.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	62.9	4.48
Nitrogen Oxides (NO _x)	70.3	17.99
Particulate Matter (PM _{2.5})	27.25	24.23
Particulate Matter (PM ₁₀)	27.25	24.23
Total Particulate Matter (TSP)	27.25	24.23
Sulfur Dioxide (SO ₂)	2.09	0.68
Volatile Organic Compounds (VOC)	15,270	70.24
Lead (Pb)	0	0
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2011 Actual Emissions
Chromium Compounds	0.07	0.01
Cumene	25.21	0.07
Dimethyl Formamide	377.21	0.00
Dimethyl Phthalate	83.90	0.09
Ethyl Benzene	109.53	0.31
Formaldehyde	0.44	0.03
Glycol Ethers	350.26	5.67
Hydrogen Chloride	0.17	NA
Hydrogen Fluoride	0.50	0.05
Isophorone	737.94	0.78
MIBK	73.96	0.29
Naphthalene	297.56	3.27
Toluene	194.97	0.10
Xylene	259.71	1.98
<i>Some of the above HAPs may be counted as PM or VOC</i>		
Other Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Phosphoric Acid	0.25	NA
Nitric Acid	0.71	NA

Title V Program Applicability Basis

This facility has the potential to emit 15,270 tons per year of volatile organic compounds (VOC), 25.21 tons per year of Cumene, 377.81 tons per year of Dimethyl Formamide, 83.90 tons per year of Dimethyl Phthalate, 109.53 tons per year of Ethyl Benzene, 350.26 tons per year of glycol ethers, 737.94 tons per year of Isophorone, 73.96 tons per year of MIBK, 297.56 tons per year of Naphthalene, 194.97 tons per year of toluene, 259.71 tons per year of xylene, and aggregate HAPs of 2,494.03 tons per year. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Precoat Metals Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Control of particulate matter from manufacturing processes.
	45CSR10	To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR16	New Source Performance Standards
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants.
	40 C.F.R. Part 60, Subpart TT	Metal Coil Surface Coating
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart SSSS	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1910D	July 30, 2012	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This renewal addresses the following changes made to the most recently issued Title V permit.

1. In condition 3.7.2., any instances where the company name "Roll Coater" appeared it was updated to "Precoat Metals."
2. In condition 5.1.4 the citation was corrected to "40 C.F.R. §60.462(a)(2)."
3. In condition 5.3.1 the emission point was changed from "002-02" to "2e" to correspond with the R13 permit.
4. In condition 5.5.3 the citation was changed from "40 C.F.R. Part 60 subpart TT" to the more specific "45CSR16, 40 C.F.R. §60.465(c)."
5. Previously in condition 6.1.13, the F factor used was 5.43, but based on the incinerator capacity of 144,000 lb/hr, the F factor should have been 2.72. Therefore, the emission limit was recalculated but compliance is still shown by complying with the more stringent limit set forth in 6.1.1.
6. In condition 6.1.18 "State-Enforceable only" was removed from the citation.
7. In condition 6.2.2 the citation was changed from "60.465" to the more specific "60.465(d)."
8. In condition 6.5.1 the citation was changed from "45CSR§30-5.1.c." to the more accurate "45CSR16, 40 C.F.R. §§ 60.7(c) and 60.465(d)," since this reporting requirement is from 40 C.F.R. 60 Subpart TT.
9. In condition 6.5.2 the citation changed from "40 C.F.R. §60.465" to the more specific "40 C.F.R. §§60.465(a) and (b)."
10. In condition 8.1.1 language streamlining the hourly PM limit of 45CSR§7-4.1 was added.
11. In condition 9.1.1. the company name was updated from "Roll Coater" to "Precoat Metals."
12. In condition 9.1.5. the minimum combustion temperature of the thermal oxidizer was updated from the average maintained during the August 2004 performance test to the average maintained during the August 2009 performance test. This is Precoat Metals' new minimum operating limit for the thermal oxidizer (4e-1).
13. Condition 9.1.12 was removed since the waiver is on file and any additional test can be requested through condition 3.3.1.

14. A note was added to condition 9.2.1 stating that the limits for the capture system are specified in conditions 9.1.10 and 9.1.11.
15. Appendix A was removed since all relevant information was already included in the permit as conditions 9.1.6 – 9.1.9.

The rest of the existing permit conditions remain unchanged since the relevant state rules and federal regulations have not changed since the last renewal in 2008.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR2	<i>To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.</i> Since the heat input to the waste heat boiler is not from combustion of fuel in a steam generating unit, the waste heat boiler is not subject to 45CSR2.
45CSR21	<i>Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.</i> 45CSR21 applies to sources located in Putnam, Kanawha, Cabell, Wayne, and Wood Counties. Since the Precoat Metals' facility is located in Brooke County, this facility is not subject to 45CSR21.
45CSR27	<i>To Prevent and Control the Emissions of Toxic Air Pollutants.</i> Potential formaldehyde emissions (0.44 tpy or 880 lbs/yr) from the Precoat Metals facility are below the applicability threshold of 1000 pounds per year. Therefore, Precoat Metals is exempted from 45CSR27.
45CSR29	<i>Rule Requiring the Submission of Emission Statements for Volatile Organic Compound Emissions and Oxides of Nitrogen Emissions.</i> 45CSR29 does not apply to this facility since it is located in Brooke County.
40 C.F.R. 60 Subpart Dc	<i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.</i> Since the heat input to the waste heat boiler is not from combustion of fuel in a steam generating unit, the waste heat boiler is not subject to 40 C.F.R. Part 60 Subpart Dc.
40 C.F.R. 63 Subpart JJJJ	<i>Paper and Other Web Coating.</i> This MACT covers coil coating lines on which 85 percent or more of the metal coil coated, based on surface area, is less than 0.15 millimeter (0.006 inch) thick. Precoat Metals' Weirton facility coats only metal coil that is greater than 0.006 inches thick.
40 C.F.R. Part 64	Precoat Metals' Pollutant Specific Emission Units, Prime and Finish Ovens, are not subject to the Compliance Assurance Monitoring (CAM) rule because they are subject to 40 C.F.R. Part 63 Subpart SSSS that was proposed after November 11, 1990. The applicable emission limitation for these units is exempt under 40 C.F.R. §64.2(b)(1)(i).
GHG Tailoring Rule	There has been no construction or modification to trigger PSD. Therefore the GHG Tailoring rule does not apply.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: May 3, 2013

Ending Date: June 3, 2013

All written comments should be addressed to the following individual and office:

Robert Mullins
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.